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Attorney for Plaintiffs

IN THE UNITED STATES DISTRICT COURT  
FOR THE  
NORTHERN MARIANA ISLANDS

LI YING HUA, LI ZHENG ZHE and XU JING JI, ) CASE NO. CV 05-0019

Plaintiffs, )

vs. )

JUNG JIN CORPORATION, a CNMI corporation, )  
ASIA ENTERPRISES, INC., a CNMI corporation, )  
PARK HWA SUN and KIM HANG KWON, )

Defendants. )

EX PARTE MOTION UNDER LOCAL  
RULES 7.1.h.3(b) AND 7.1.h.5 FOR AN  
ORDER SHORTENING TIME FOR  
HEARING PLAINTIFFS'  
APPLICATION FOR AN ORDER IN  
AID OF JUDGMENT

Date:

Time:

Judge: Hon. Alex R. Munson, Chief Judge

Plaintiffs, by and through their undersigned attorney of record, hereby file, this Motion to Shorten Time, *ex parte*, pursuant to Fed R. Civ. P. 6(d) and Local Rule 7.1.h.5 for hearing the Application of Plaintiffs for an Order in Aid of Judgment pursuant to Fed. R. Civ. P. 69(a) and Title 7, Sections 4205 of the Commonwealth Code (2000).

CERTIFICATE PURSUANT TO LOCAL RULE 7.1.H.3(b)

1. I am the attorney for Plaintiffs in the above-captioned case. I submit this certificate pursuant to Local Rules 7.1.h.3(b) in support of CNMI Travel's *ex parte* motion for an order shortening time for hearing Plaintiffs' Application for an Order in Aid of Judgment. In support of this motion, Plaintiffs submit this Certificate of the undersigned.

2. Plaintiffs have information suggesting that defendants Park Hwa Sun and Kim Hang

1 Kwon, both the sole principals of defendants Jung Jin Corporation and Asia Enterprises, Inc., have  
2 departed the Commonwealth and are currently in South Korea with no apparent plans to return to  
3 the Commonwealth. See Declaration of Mark B. Hanson.

4 3. On January 27, 2006, Park Hwa Sun failed to appear at a duly noticed deposition have fled  
5 to South Korea.

6 4. Most recently, on November 19, 2006, Kim Hang Kwon failed to appear at a duly noticed  
7 deposition having fled to South Korea.

8 5. Plaintiffs have no way of communicating with the Defendants, or any of them, to  
9 expeditiously, bring Plaintiffs' collection matters to the attention of the Court.

10 6. Plaintiffs have information to suggest that Defendants are currently in default on the  
11 ground lease of Lot No. 056 H 14, a part of Lot No. 056 H 03, a 3,627 square meter parcel of  
12 improved property located in Susupe, Saipan, CNMI upon which a house of defendants and another  
13 structure are located.

14 7. Any further delay in collection efforts could result in more assets evading or escaping  
15 altogether Plaintiffs' ability to seize and sell the assets to satisfy a judgment by this Court against the  
16 Defendants, jointly and severally, in an amount exceeding \$200,000.00.

17 8. Time is of the utmost essence.

18 9. Defendants are proceeding *pro se* since the withdrawal of their attorney prior to the  
19 judgment in this matter. Their last know contact information is as follows:

20 Jung Jin Corporation  
21 P.O. Box 503428  
22 Saipan, MP 96950  
(670) 235-4321

Park Hwa Sun  
P.O. Box 503428  
Saipan, MP 96950  
(670) 235-4321

23 Asia Enterprises Inc.  
24 P.O. Box 503448  
25 Saipan, MP 96950  
(670) 235-4321

Kim Hang Kwon  
P.O. Box 503448  
Saipan, MP 96950  
(670) 235-4321

26 7. The above-listed defendants will receive a copy of this motion, counsel's declaration, and  
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1 the application for an order in aid of judgment by certified mail, return receipt requested to the  
2 above-listed addresses, and will be notified in the same manner of any hearing on this motion.

3  
4 WHEREFORE, for the foregoing reasons, Plaintiffs respectfully request that the Court grant  
5 its motion to shorten time and set a hearing on Plaintiffs' Application for an Order in Aid of as soon  
6 hereafter as the Court will allow. A proposed order has been submitted herewith for the Court's  
7 convenience.

8 Respectfully submitted this 28<sup>th</sup> day of November, 2006.

9  
10 /s/ Mark B. Hanson

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